

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

NUCLEAR DEVELOPMENT, LLC,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION CASE NUMBER:
vs.	§	
	§	5:18-cv-01983-LCB
TENNESSEE VALLEY AUTHORITY,	§	
	§	
Defendant.	§	

PLAINTIFF'S AMENDED DESIGNATION OF DEPOSITION TESTIMONY

Nuclear Development, LLC designates by line and page the following deposition testimony that it may offer at the trial of this matter:

1. Deposition of Joseph Shea: 6:7-13; 8:8-11; 9:13-10:4; 12:16-13:11; 14:18-15:3; 33:3-38:9; 39:8-15; 44:1-45:5; 54:1-18; 87:13-88:12; 104:25-106:8; 106:14-107:12.
2. Deposition of Marie Gillman: 5:23-25; 7:5-23; 8:17-23; 11:9-12:10; 12:17-13:8; 19:3-8; 30:21-25; 31:5-13; 34:6-7; 35:16-36:18; 40:9-41:8; 43:4-15; 55:19-56:20; 57:10-14; 57:25-58:20; 60:25-61:4; 61:11-21; 77:7-78:22; 80:10-81:15; 95:17-96:17.
3. Deposition of Robert Coward: 11:1-3; 12:9-10; 12:14-16; 12:23-13:9; 13:13-14:1; 14:14-15:4; 23:14-24:7.
4. Deposition of Sherry Quirk: 7:7-14; 9:24-25; 12:2-5; 12:11-17; 17:15-18:1; 20:15-24; 21:9-16; 21:19-22:2; 22:10-23:10; 26:4-7; 34:2-11; 35:21-23; 46:1-4; 47:10-13; 49:10-23; 50:18-22; 51:11-52:18; 53:6-14; 54:1-55:5; 55:23-56:11; 58:3-8; 58:24-59:12;

61:2-62:1; 62:14-63:6; 67:18-69:5; 69:18-21; 70:3-72:10; 72:19-73:5; 79:6-14; 80:15-81:11; 82:23-84:1; 88:19-89:9; 92:3-21; 93:8-18; 93:23-94:20; 96:10-12.

5. Deposition of William Johnson: 7:9-19; 8:25-9:6; 11:5-12:20; 13:8-14:13; 15:12-21; 16:11-20:22; 21:2-22:2; 23:8-25; 25:21-26:25; 27:9-28:4; 33:2-9; 36:19-37:8; 37:19-38:1; 44:3-47:22; 53:3-6; 53:17-23; 61:1-5; 65:24-67:17; 68:5-70:9; 72:8-14; 73:8-74:15; 75:3-22; 77:16-78:4; 79:21-80:13; 81:10-18; 86:2-13; 89:5-8; 91:8-16; 91:25-92:5; 93:5-97:20; 97:24-98:2; 99:4-101:7; 101:18-102:3; 102:14-17; 102:25-107:20; 109:10-22; 110:6-17; 111:4-112:7; 117:8-118:22; 119:2-4.

6. Deposition of Franklin L. Haney, Sr.: 7:9-11; 8:14-9:10; 9:15-21; 10:10-12:23; 14:7-12; 18:14-23; 21:15-22:1; 39:5-40:4; 43:10-44:15; 47:7-48:7; 100:20-103:9; 106:4-11; 107:11-108:4; 108:22-25; 109:4-13; 113:2-15.

Nuclear Development submits its Deposition Designations without waiving its objections to the Court's April 12, 2021 Order (doc. 175) limiting the matters for trial based on the Court's Summary Judgment Order (doc. 161) as stated on the record during the parties pre-trial hearing on April 8, 2021. Nuclear Development continues to object to the Court's April 12, 2021 Order (doc. 175) regarding the matters for trial and the Summary Judgment Order (doc. 161).

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CERTIFICATE OF SERVICE

I do hereby certify that, on April 16, 2021, I filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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